

LAW OFFICES OF LEONARD A. SCLAFANI, P.C.

Attorneys at Law
One Battery Park Plaza, 33rd Fl.
New York, New York 10004
212-696-9880
l.a.s@mindspring.com

July 2, 2012

Hon. Paul A. Engelmeyer, USDJ
United States District Courthouse
500 Pearl Street
New York, N.Y. 10007-1312

Re: Rajeev Pahuja v. American University of Antigua, 11 Civ. 4607 (PAE)

Dear Judge Englemeyer,

I am writing as counsel to American University of Antigua, defendant in the above referenced matter, in opposition to the application that plaintiff has made by letter to your Honor dated June 25, 2012, for an extension of time to oppose defendant's motion to dismiss his complaint. Through his letter, plaintiff claims that he received defendant's motion papers on June 23, 2012. He was served at his residence address by mail on June 15, 2012. As it does not take 8 days for mail from New York City to reach Hamden Connecticut, a serious issue exists as to the credibility of plaintiff's claim. However, even if plaintiff's assertion is found to be accurate, there is ample reason for the Court to deny plaintiff's application.

Plaintiff asserts as the basis of his motion that he suffers from Attention Deficit Syndrome and, therefore, "will not be able to do an opposition motion to dismiss in fourteen days." However, plaintiff's opposition to defendant's motion is not due until July 31, 2012.

Thus, plaintiff has been provided, and there remains as of today's date, well more than the fourteen days that plaintiff claims he was afforded to oppose defendant's motion and more than adequate time within which for him to do so notwithstanding any disability that he may have, or claim to have.

I, therefore, respectfully request that plaintiff's application be denied.

Very truly yours,


Leonard A. Sclafani, Esq. (JS8306)

Cc; Rajeev Pahuja
55 Duel Drive
Hamden, Ct. 06518